

**DRAFT**

[Issuance Date]

**CERTIFIED MAIL**  
**RETURN RECEIPT REQUESTED**

05-XXX-E CAB  
File No. 0105a-01

Captain Richard D. Roth  
Commanding Officer  
Program Manager for Facilities, Environmental,  
Safety, & Passenger Transportation  
Regional Environmental Department  
Navy Region Hawaii  
850 Ticonderoga Street, Suite 110  
Pearl Harbor, Hawaii 96860-5101

Attn: Darren Chun

Dear Captain Roth:

**Subject: Covered Source Permit (CSP) No. 0105a-01-C**  
**Renewal Application No. 0105-08**  
**U.S. Navy - Navy Region Hawaii - Naval Station, Pearl Harbor**  
**Ship Building and Repair Operations**  
**Located at: NAVSTA PHNC, Pearl Harbor, Hawaii**  
**Date of Expiration: [Five (5) Year Period from Issuance Date]**

The subject Covered Source Permit is issued in accordance with Hawaii Administrative Rules, Title 11, Chapter 60.1. The issuance of this permit is based on the plans, specifications, and additional information that you submitted as part of your renewal application dated March 23, 2003 and the additional information dated April 22, 2005.

This Covered Source Permit supersedes CSP No. 0105a-01-C issued on April 14, 1999, and the amendments issued on September 24, 1999 and March 12, 2002, in their entirety.

The Covered Source Permit is issued subject to the conditions/requirements set forth in the following Attachments:

Attachment I: Standard Conditions  
Attachment II: Special Conditions for Ship Building and Repair Operations  
Attachment III: Annual Fee Requirements  
Attachment IV: Annual Emissions Reporting Requirements

Enclosed for submission is the Compliance Certification Form.

This permit: (a) shall not in any manner affect the title of the premises upon which the equipment is to be located; (b) does not release the permittee from any liability for any loss due to personal injury or property damage caused by, resulting from or arising out of the design, installation, maintenance, or operation of the equipment; and (c) in no manner implies or suggests that the Department of Health, or its officers, agents, or employees, assumes any liability, directly or indirectly, for any loss due to personal injury or property damage caused by, resulting from or arising out of the design, installation, maintenance, or operation of the equipment.

Sincerely,

THOMAS E. ARIZUMI, P.E., CHIEF  
Environmental Management Division

SS:lk

Enclosures

c: CAB Monitoring Section

**ATTACHMENT I: STANDARD CONDITIONS  
COVERED SOURCE PERMIT NO. 0105a-01-C**

**[Issuance Date]**

**[Expiration Date]**

This permit is granted in accordance with the Hawaii Administrative Rules (HAR), Title 11, Chapter 60.1, Air Pollution Control, and is subject to the following standard conditions:

1. Unless specifically identified, the terms and conditions contained in this permit are consistent with the applicable requirement, including form, on which each term or condition is based.  
  
(Auth.: HAR §11-60.1-90)
2. This permit, or a copy thereof, shall be maintained at or near the source and shall be made available for inspection upon request. The permit shall not be willfully defaced, altered, forged, counterfeited, or falsified.  
  
(Auth.: HAR §11-60.1-6; SIP §11-60-11)<sup>2</sup>
3. This permit is not transferable whether by operation of law or otherwise, from person to person, from place to place, or from one piece of equipment to another without the approval of the Department of Health, except as provided in HAR, Section 11-60.1-91.  
  
(Auth.: HAR §11-60.1-7; SIP §11-60-9)<sup>2</sup>
4. A request for transfer from person to person shall be made on forms furnished by the Department of Health.  
  
(Auth.: HAR §11-60.1-7)
5. In the event of any changes in control or ownership of the facilities to be constructed or modified, this permit shall be binding on all subsequent owners and operators. The permittee shall notify the succeeding owner and operator of the existence of this permit and its conditions by letter, copies of which will be forwarded to the Department of Health and the Regional Administrator for the U.S. Environmental Protection Agency (EPA).  
  
(Auth.: HAR §11-60.1-5, §11-60.1-7, §11-60.1-94)
6. The facility covered by this permit shall be constructed and operated in accordance with the application, and any information submitted as part of the application, for the Covered Source Permit. There shall be no deviation unless additional or revised plans are submitted to and approved by the Department of Health, and the permit is amended to allow such deviation.  
  
(Auth.: HAR §11-60.1-2, §11-60.1-4, §11-60.1-82, §11-60.1-84, §11-60.1-90)

7. This permit (a) does not release the permittee from compliance with other applicable statutes of the State of Hawaii, or with applicable local laws, regulations, or ordinances, and (b) shall not constitute, nor be construed to be an approval of the design of the covered source.

(Auth.: HAR §11-60.1-5, §11-60.1-82)

8. The permittee shall comply with all the terms and conditions of this permit. Any permit noncompliance constitutes a violation of HAR, Chapter 11-60.1 and the Clean Air Act and is grounds for enforcement action; for permit termination, suspension, reopening, or amendment; or for denial of a permit renewal application.

(Auth.: HAR §11-60.1-3, §11-60.1-10, §11-60.1-19, §11-60.1-90)

9. If any term or condition of this permit becomes invalid as a result of a challenge to a portion of this permit, the other terms and conditions of this permit shall not be affected and shall remain valid.

(Auth.: HAR §11-60.1-90)

10. The permittee shall not use as a defense in an enforcement action that it would have been necessary to halt or reduce the permitted activity to maintain compliance with the terms and conditions of this permit.

(Auth.: HAR §11-60.1-90)

11. This permit may be terminated, suspended, reopened, or amended for cause pursuant to HAR, Sections, 11-60.1-10 and 11-60.1-98, and Hawaii Revised Statutes (HRS), Chapter 342B-27, after affording the permittee an opportunity for a hearing in accordance with HRS, Chapter 91.

(Auth.: HAR §11-60.1-3, §11-60.1-10, §11-60.1-90, §11-60.1-98)

12. The filing of a request by the permittee for the termination, suspension, reopening, or amendment of this permit, or of a notification of planned changes or anticipated noncompliance does not stay any permit condition.

(Auth.: HAR §11-60.1-90)

13. This permit does not convey any property rights of any sort, or any exclusive privilege.

(Auth.: HAR §11-60.1-90)

14. The permittee shall notify the Department of Health in writing of the following dates:

- a. The **anticipated date of initial start-up** for each emission unit of a new source or significant modification not more than sixty (60) days or less than thirty (30) days prior to such date;
- b. The **actual date of construction commencement** within fifteen (15) days after such date; and
- c. The **actual date of start-up** within fifteen (15) days after such date.

(Auth.: HAR §11-60.1-90)

15. The permittee shall furnish, in a timely manner, any information or records requested in writing by the Department of Health to determine whether cause exists for terminating, suspending, reopening, or amending this permit, or to determine compliance with this permit. Upon request, the permittee shall also furnish to the Department of Health copies of records required to be kept by the permittee. For information claimed to be confidential, the Director of Health may require the permittee to furnish such records not only to the Department of Health but also directly to the U.S. EPA Administrator along with a claim of confidentiality.

(Auth.: HAR §11-60.1-14, §11-60.1-90)

16. The permittee shall notify the Department of Health in writing, of the **intent to shut down air pollution control equipment for necessary scheduled maintenance** at least twenty-four (24) hours prior to the planned shutdown. The submittal of this notice shall not be a defense to an enforcement action. The notice shall include the following:

- a. Identification of the specific equipment to be taken out of service, as well as its location and permit number;
- b. The expected length of time that the air pollution control equipment will be out of service;
- c. The nature and quantity of emissions of air pollutants likely to be emitted during the shutdown period;
- d. Measures such as the use of off-shift labor and equipment that will be taken to minimize the length of the shutdown period; and
- e. The reasons why it would be impossible or impractical to shut down the source operation during the maintenance period.

(Auth.: HAR §11-60.1-15; SIP §11-60-16)<sup>2</sup>

17. **Except for emergencies which result in noncompliance with any technology-based emission limitation in accordance with HAR, Section 11-60.1-16.5, in the event any emission unit, air pollution control equipment, or related equipment malfunctions or breaks down in such a manner as to cause the emission of air pollutants in violation of HAR, Chapter 11-60.1 or this permit,** the permittee shall immediately notify the Department of Health of the malfunction or breakdown, unless the protection of personnel or public health or safety demands immediate attention to the malfunction or breakdown and makes such notification infeasible. In the latter case, the notice shall be provided as soon as practicable. Within five (5) working days of this initial notification, the permittee shall also submit, in writing, the following information:
- Identification of each affected emission point and each emission limit exceeded;
  - Magnitude of each excess emission;
  - Time and duration of each excess emission;
  - Identity of the process or control equipment causing the excess emission;
  - Cause and nature of each excess emission;
  - Description of the steps taken to remedy the situation, prevent a recurrence, limit the excessive emissions, and assure that the malfunction or breakdown does not interfere with the attainment and maintenance of the National Ambient Air Quality Standards and state ambient air quality standards;
  - Documentation that the equipment or process was at all times maintained and operated in a manner consistent with good practice for minimizing emissions; and
  - A statement that the excess emissions are not part of a recurring pattern indicative of inadequate design, operation, or maintenance.

The submittal of these notices shall not be a defense to an enforcement action.

(Auth.: HAR §11-60.1-16; SIP §11-60-16)<sup>2</sup>

18. A copy of applicable correspondence or records submitted to the Department of Health shall be provided to the U.S. EPA Administrator.

(Auth.: HAR §11-60.1-90)

19. The permittee may request confidential treatment of any records in accordance with HAR section 11-60.1-14.

(Auth.: HAR §11-60.1-14, §11-60.1-90)

20. This permit shall become invalid with respect to the authorized construction if construction is not commenced as follows:

- a. Within eighteen (18) months after the permit takes effect, is discontinued for a period of eighteen (18) months or more, or is not completed within a reasonable time.
- b. For phased construction projects, each phase shall commence construction within eighteen (18) months of the projected and approved commencement dates in the permit. This provision shall be applicable only if the projected and approved commencement dates of each construction phase are defined in Attachment II, Special Conditions, of this permit.

(Auth.: HAR §11-60.1-9, §11-60.1-90)

21. The Department of Health may extend the time periods specified in Standard Condition No. 20 upon a satisfactory showing that an extension is justified. Requests for an extension shall be submitted in writing to the Department of Health.

(Auth.: HAR §11-60.1-9, §11-60.1-90)

22. The permittee shall submit fees in accordance with HAR, Chapter 11-60.1, Subchapter 6.

(Auth.: HAR §11-60.1-90)

23. All certifications shall be in accordance with HAR, section 11-60.1-4.

(Auth.: HAR §11-60.1-4, HAR §11-60.1-90)

24. The permittee shall allow the Director of Health, the Regional Administrator for the U.S. EPA and/or an authorized representative, upon presentation of credentials or other documents required by law:

- a. To enter the premises where a source is located or emission-related activity is conducted, or where records must be kept under the conditions of this permit and inspect at reasonable times all facilities, equipment, including monitoring and air pollution control equipment, practices, operations, or records covered under the terms and conditions of this permit and request copies of records or copy records required by this permit; and
- b. To sample or monitor at reasonable times substances or parameters to ensure compliance with this permit or applicable requirements of HAR, Chapter 11-60.1.

(Auth.: HAR §11-60.1-11, §11-60.1-90)

25. Within thirty (30) days of **permanent discontinuance of the construction, modification, relocation, or operation of the facility covered by this permit**, the discontinuance shall be reported in writing to the Department of Health by a responsible official of the source.

(Auth.: HAR §11-60.1-8; SIP §11-60-10)<sup>2</sup>

26. Each permit renewal application shall be submitted to the Department of Health no less than twelve months and no more than eighteen months prior to the permit expiration date. The director may allow a permit renewal application to be submitted no less than six months prior to the permit expiration date, if the director determines that there is reasonable justification.

(Auth.: HAR §11-60.1-101, 40 CFR §70.5(a)(1)(iii))<sup>1</sup>

27. The terms and conditions included in this permit, including any provision designed to limit a source's potential to emit, are federally enforceable unless such terms, conditions, or requirements are specifically designated as not federally enforceable.

(Auth.: HAR §11-60.1-93)

28. The compliance plan and compliance certification submittal requirements shall be in accordance with HAR, sections 11-60.1-85 and 11-60.1-86. As specified in HAR, section 11-60.1-86, the compliance certification shall be submitted to the Department of Health and the U.S. EPA Regional Administrator once per year, or more frequently as set by any applicable requirement.

(Auth.: HAR §11-60.1-90)

29. **Any document (including reports) required to be submitted by this permit shall be certified as being true, accurate, and complete by a responsible official in accordance with HAR, sections 11-60.1-1 and 11-60.1-4, and shall be mailed to the following address:**

Clean Air Branch  
Environmental Management Division  
State of Hawaii Department of Health  
P.O. Box 3378  
Honolulu, HI 96801-3378



**Upon request, all correspondence to the State of Hawaii Department of Health associated with this Covered Source Permit shall have duplicate copies forwarded to:**

**Chief  
Permits Office, (Attention: Air-3)  
Air Division  
U.S. Environmental Protection Agency  
Region 9  
75 Hawthorne Street  
San Francisco, CA 94105**

(Auth.: HAR §11-60.1-4, §11-60.1-90)

30. To determine compliance with submittal deadlines for time-sensitive documents, the postmark date of the document shall be used. If the document was hand-delivered, the date received ("stamped") at the Clean Air Branch shall be used to determine the submittal date.

(Auth.: HAR §11-60.1-5, §11-60.1-90)

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<sup>1</sup> The citations to the Code of Federal Regulations (CFR) identified under a particular condition, indicate that the permit condition complies with the specified provision(s) of the CFR. Due to the integration of the preconstruction and operating permit requirements, permit conditions may incorporate more stringent requirements than those set forth in the CFR.

<sup>2</sup> The citations to the State Implementation Plan (SIP) identified under a particular condition, indicate that the permit condition complies with the specified provision(s) of the SIP.

**ATTACHMENT II: SPECIAL CONDITIONS  
FOR SHIP BUILDING AND REPAIR OPERATIONS  
COVERED SOURCE PERMIT NO. 0105a-01-C**

**[Issuance Date]**

**[Expiration Date]**

In addition to the standard conditions of the Covered Source Permit, the following special conditions shall apply to the permitted facility:

**Section A. Equipment Description**

This permit encompasses shipbuilding and repair operations as covered by 40 CFR 63, Subpart II.

(Auth.: HAR ' 11-60.1-3)

**Section B. Applicable Federal Regulations**

1. The facility is subject to the provisions of the following federal regulations:
  - a. 40 CFR Part 63, Standards for Hazardous Air Pollutants for Source Categories, Subpart A - General Provisions; and
  - b. 40 CFR Part 63, Standards for Hazardous Air Pollutants for Source Categories, Subpart II - NESHAP for Shipbuilding and Ship Repair Operations

(Auth.: HAR ' 11-60.1-3, ' 11-60.1-5, ' 11-60.1-90, 40 CFR ' 63.1, ' 63.780, ' 63.781)<sup>1</sup>

2. The permittee shall comply with all applicable provisions of these standards, including all emission limits, notification, testing, monitoring, and reporting requirements. The major requirements of these standards are detailed in the special conditions of this permit.

(Auth.: HAR ' 11-60.1-3, ' 11-60.1-90, ' 11-60.1-173, 40 CFR ' 63.1, ' 63.780, ' 63.781)<sup>1</sup>

**Section C. Operational and Emission Limitations**

1. Shipbuilding and Ship Repair
  - a. The permittee shall not cause or allow the application of any coating to a ship with an as-applied volatile organic hazardous air pollutant (VOHAP) content exceeding the applicable limits listed below. The VOHAP content shall be determined by the procedures described in Section F. Testing Requirements of this Attachment.

<b>VOHAP Limits<sup>a,b,c</sup></b>			
	Grams/liter coating	Grams/liter solids <sup>d</sup>	
Coating Category	(minus water and exempt compounds)	t ≥ 4.5 °C	t < 4.5 °C <sup>e</sup>
General use	340	571	728
Specialty:			
Air flask	340	571	728
Antenna	530	1,439	
Antifoulant	400	765	971
Heat Resistant	420	841	1,069
High Gloss	420	841	1,069
High Temperature	500	1,237	1,597
Inorganic Zinc High Build	340	571	728
Military Exterior	340	571	728
Mist	610	2,235	
Navigational Aids	550	1,597	
Nonskid	340	571	728
Nuclear	420	841	1,069
Organic Zinc	360	630	802
Pretreatment Wash Primer	780	11,095	

<b>VOHAP Limits<sup>a,b,c</sup></b>			
	Grams/liter coating	Grams/liter solids <sup>d</sup>	
Repair and Maintenance of Thermoplastics	550	1,597	
Rubber Camouflage	340	571	728
Sealant for Thermal Spray Aluminum	610	2,235	
Special Marking	490	1,178	
Specialty Interior	340	571	728
Tack Coat	610	2,235	
Undersea Weapons Systems	340	571	728
Weld Through Precon. Primer	650	2,885	

- <sup>a</sup> The limits are expressed in two sets of equivalent units. Either set of limits may be used for the compliance procedure described in Special Condition D.1.c., but only the limits expressed in units of g/L solids (nonvolatiles) shall be used for the compliance procedures described Special Conditions D.1.d. through f.
- <sup>b</sup> VOC (including exempt compounds listed as HAP) shall be used as a surrogate for VOHAP for those compliance procedures described in Special Conditions D.1.c. through e.
- <sup>c</sup> To convert from g/L to lb/gal, multiply by (3.785 L/gal)(1/453.6 lb/g) or 1/120. For compliance purposes, metric units define the standards.
- <sup>d</sup> VOHAP limits expressed in units of mass of VOHAP per volume of solids were derived from the VOHAP limits expressed in units of mass of VOHAP per volume of coating assuming the coatings contain no water or exempt compounds and that the volumes of all components within a coating are additive.

<sup>e</sup> These limits apply during cold-weather time periods, as defined in 40 CFR ' 63.782. Cold-weather allowances are not given to coatings in categories that permit less than 40 percent volume solids (nonvolatiles). Such coatings are subject to the same limits regardless of weather conditions.

- b. The permittee shall ensure that the following provisions are adhered to.
  - 1) All handling and transfer of VOHAP-containing materials to and from containers, tanks, vats, drums, and piping systems is conducted in a manner that minimizes spills.
  - 2) All containers, tanks, vats, drums, and piping systems are free of cracks, holes, and other defects and remain closed unless materials are being added to or removed from them.
- c. The permittee may apply to the Department of Health for permission to use an alternative means (such as an add-on control system) of limiting emissions from coating operations. The application shall include the following:
  - 1) An engineering material balance evaluation that provides a comparison of the emissions that would be achieved using the alternative means to those that would result from using coatings that comply with the limits of Special Condition C.1.a. of Attachment II, or the results from an emission test that accurately measures the capture efficiency and control device efficiency achieved by the control system and the composition of the associated coatings so that the emissions comparison can be made;
  - 2) A proposed monitoring protocol that includes operating parameter values to be monitored for compliance and an explanation of how the operating parameter values will be established through a performance test; and
  - 3) Details of appropriate recordkeeping and reporting procedures.

The Department of Health shall approve the alternative means of limiting emissions if, in the Department of Health's judgment, post-control emissions of VOHAP per volume applied solids will be no greater than those from the use of coatings that comply with the limits of Special Condition C.1.a. of Attachment II.

The Department of Health may impose additional operational, maintenance, and monitoring requirements to ensure that emissions from the source are no greater than those that would otherwise result from Attachment II.

**Section D. Monitoring and Recordkeeping Requirements**

All records, including support information, shall be maintained for at least five (5) years from the date of the monitoring sample, measurement, test, report, or application. Support information includes all calibration and maintenance records and copies of all reports required by the permit. These records shall be in a permanent form suitable for inspection and made available to the Department of Health or their representative upon request.

**1. Shipbuilding and Ship Repair**

- a. For each batch of coating that is received by an affected source, the permittee shall:
  - 1) Determine the coating category and the applicable VOHAP limit as specified in Special Condition C.1.a.
  - 2) Certify the as-supplied VOC content of the batch of coating. The certification supplied by the manufacturer for the batch may be used, although the permittee retains liability should subsequent testing reveal a violation. If the permittee performs the certification testing, only one of the containers in which the batch of coating was received is required to be tested.
- b. In lieu of testing each batch of coating, as applied, the permittee may determine compliance with the VOHAP limits using any combination of the procedures described in Special Conditions D.1.c. through f. of this section. The procedure used for each coating shall be determined and documented prior to application.
  - 1) The results of any compliance demonstration conducted by the affected source or any regulatory agency using Method 24 shall take precedence over the results using the procedures in Special Conditions D.1.c through e.
  - 2) The results of any compliance demonstration conducted by the affected source or any regulatory agency using an approved test method to determine VOHAP content shall take precedence over the results using the procedures in Special Condition D.1.f.
- c. For coatings to which thinning solvent (or any other material) will not be added under any circumstance or to which only water is added, the permittee shall adhere to the following provisions.
  - 1) Certify the as-applied VOC content of each batch of coating.
  - 2) Notify the persons responsible for applying the coating that no thinning solvent may be added to the coating by affixing a label to each container of coating in the batch or through another means described in the implementation plan required in Special Condition E.5.b.

- 3) If the certified as-applied VOC content of each batch of coating used during a calendar month is less than or equal to the applicable VOHAP limit in Special Condition C.1.a. of this Attachment (either in terms of g/L of coating or g/L of solids), then compliance is demonstrated for that calendar month, unless a violation is revealed using Method 24 of Appendix A to 40 CFR part 60.
- d. For a coating to which thinning solvent is routinely or sometimes added, the permittee shall adhere to the following provisions.
- 1) Prior to the first application of each batch, designate a single thinner for the coating and calculate the maximum allowable thinning ratio (or ratios, if the affected source complies with the cold-weather limits in addition to the other limits specified in Special Condition C.1.a. of this Attachment) for each batch as follows:

$$R = \frac{(V_s) * (\text{VOHAP limit}) - m_{\text{voc}}}{D_{\text{th}}} \quad \text{Equation 1}$$

where:

R= Maximum allowable thinning ratio for a given batch (L thinner/L coating as supplied);

$V_s$ = Volume fraction of solids in the batch as supplied (L solids/L coating as supplied);

VOHAP limit= Maximum allowable as-applied VOHAP content of the coating (g VOHAP/L solids);

$m_{\text{voc}}$  = VOC content of the batch as supplied [g VOC (including cure volatiles and exempt compounds on the HAP list)/L coating (including water and exempt compounds) as supplied];

$D_{\text{th}}$ = Density of the thinner (g/L).

If  $V_s$  is not supplied directly by the coating manufacturer, the permittee shall determine  $V_s$  as follows:

$$V_s = 1 - \frac{m_{\text{volatiles}}}{D_{\text{avg}}} \quad \text{Equation 2}$$

where:

$m_{\text{volatiles}}$ = Total volatiles in the batch, including VOC, water, and exempt compounds (g/L coating); and

$D_{\text{avg}}$ = Average density of volatiles in the batch (g/L).

The procedures specified in Special Condition F.4. may be used to determine the values of variables defined in this paragraph. In addition, the permittee may choose to construct nomographs, based on Equation 1 of this subpart, similar or identical to the one provided in Appendix B of 40 CFR Part 63 Subpart II as a means of easily estimating the maximum allowable thinning ratio.

- 2) Prior to the first application of each batch, notify painters and other persons, as necessary, of the designated thinner and maximum allowable thinning ratio(s) for each batch of the coating by affixing a label to each container of coating or through another means described in the implementation plan required in Special Condition E.5.b.
- 3) By the 15th day of each calendar month, determine the volume of each batch of the coating used, as supplied, during the previous month.
- 4) By the 15th day of each calendar month, determine the total allowable volume of thinner for the coating used during the previous month as follows:

$$V_{th} = \sum_{i=1}^n (R * V_b)_i + \sum_{i=1}^n (R_{cold} * V_{b-cold})_i \quad \text{Equation 3}$$

where:

$V_{th}$ = Total allowable volume of thinner for the previous month (L thinner);

$V_b$ = Volume of each batch, as supplied and before being thinned, used during non-cold-weather days of the previous month (L coating as supplied);

$R_{cold}$ = Maximum allowable thinning ratio for each batch used during cold-weather days (L thinner/L coating as supplied);

$V_{b-cold}$ = Volume of each batch, as supplied and before being thinned, used during cold-weather days of the previous month (L coating as supplied);

$i$ = Each batch of coating; and

$n$ = Total number of batches of the coating.

- 5) By the 15th day of each calendar month, determine the volume of thinner actually used with the coating during the previous month.
- 6) If the volume of thinner actually used with the coating (Special Condition D.1.d.5) is less than or equal to the total allowable volume of thinner for the coating (Special Condition D.1.d.4), then compliance is demonstrated for the coating for the previous month, unless a violation is revealed using Method 24 of Appendix A to 40 CFR part 60.



- e. For coatings to which the same thinning solvent (or other material) is routinely or sometimes added, the permittee shall adhere to the following provisions.
  - 1) Designate a single thinner to be added to each coating during the month and "group" coatings according to their designated thinner.
  - 2) Prior to the first application of each batch, calculate the maximum allowable thinning ratio (or ratios, if the affected source complies with the cold-weather limits in addition to the other limits specified in Special Condition C.1.a. of this Attachment) for each batch of coating in the group using the equations in Special Condition D.1.d.
  - 3) Prior to the first application of each "batch," notify painters and other persons, as necessary, of the designated thinner and maximum allowable thinning ratio(s) for each batch in the group by affixing a label to each container of coating or through another means described in the implementation plan required in Special Condition E.5.b.
  - 4) By the 15th day of each calendar month, determine the volume of each batch of the group used, as supplied, during the previous month.
  - 5) By the 15th day of each calendar month, determine the total allowable volume of thinner for the group for the previous month using Equation 3 of Special Condition D.1.d.4).
  - 6) By the 15th day of each calendar month, determine the volume of thinner actually used with the group during the previous month.
  - 7) If the volume of thinner actually used with the group (Special Condition D.1.e.6) is less than or equal to the total allowable volume of thinner for the group (Special Condition D.1.e.5)), then compliance is demonstrated for the group for the previous month, unless a violation is revealed using Method 24 of Appendix A to 40 CFR part 60.
- f. The permittee shall adhere to the following provisions to demonstrate compliance through an alternative (i.e., other than Method 24 of Appendix A to 40 CFR part 60) test method.
  - 1) Certify the as-supplied VOHAP content (g VOHAP/L solids) of each batch of coating.
  - 2) If no thinning solvent will be added to the coating, the permittee shall follow the procedure described in Special Condition D.1.c., except that VOHAP content shall be used in lieu of VOC content.

- 3) If thinning solvent will be added to the coating, the owner or operator of an affected source shall follow the procedure described in Special Condition D.1.d. or e., except that in Equation 1 of Special Condition D.1.d.: the term " $m_{VOC}$ " shall be replaced by the term " $m_{VOHAP}$ ," defined as the VOHAP content of the coating as supplied (g VOHAP/L coating) and the term " $D_{th}$ " shall be replaced by the term " $D_{th(VOHAP)}$ " defined as the average density of the VOHAP thinner(s) (g/L).
- g. For surface coating operations using less than 1000 liters (L) (264 gallons [gal]) per year, the permittee shall record the total volume of coating applied.
- h. For surface coating operations using 1000 liters (L) (264 gallons [gal]) per year or more, the permittee shall compile the following records on a monthly basis and maintain those records for a minimum of 5 years.
  - 1) All documentation supporting initial notification;
  - 2) A copy of the affected source's approved implementation plan;
  - 3) The volume of each low-usage-exempt coating applied;
  - 4) Identification of the coatings used, their appropriate coating categories, and the applicable VOHAP limit;
  - 5) Certification of the as-supplied VOC content of each batch of coating;
  - 6) A determination of whether containers meet the standards as described in Special Condition C.1.b.2); and
  - 7) The results of any Method 24 of appendix A to 40 CFR part 60 or approved VOHAP measurement test conducted on individual containers of coating, as applied.
- i. Any additional information, as determined by the compliance procedure(s) described in Special Conditions D.1.c thru f that were used to demonstrate compliance.
  - 1) Coatings to which thinning solvent will not be added. The records maintained by facilities demonstrating compliance using the procedure described in Special Condition D.1.c. shall contain the following information.
    - a) Certification of the as-applied VOC content of each batch of coating; and
    - b) The volume of each coating applied.

- 2) Coatings to which thinning solvent will be added-coating-by-coating compliance. The records maintained by facilities demonstrating compliance using the procedure described in Special Condition D.1.d. shall contain the following information:
  - a) The density and mass fraction of water and exempt compounds of each thinner and the volume fraction of solids (nonvolatiles) in each batch, including any calculations;
  - b) The maximum allowable thinning ratio (or ratios, if the affected source complies with the cold-weather limits in addition to the other limits specified in Special Condition C.1.a.) for each batch of coating, including calculations;
  - c) If the permittee chooses to comply with the cold-weather limits, the dates and times during which the ambient temperature at the affected source was below 4.5°C (40°F) at the time the coating was applied and the volume used of each batch of the coating, as supplied, during these dates;
  - d) The volume used of each batch of the coating, as supplied;
  - e) The total allowable volume of thinner for each coating, including calculations; and
  - f) The actual volume of thinner used for each coating.
- 3) Coatings to which the same thinning solvent will be added-group compliance. The records maintained by facilities demonstrating compliance using the procedure described in Special Condition D.1.e. shall contain the following information:
  - a) The density and mass fraction of water and exempt compounds of each thinner and the volume fraction of solids in each batch, including any calculations;
  - b) The maximum allowable thinning ratio (or ratios, if the affected source complies with the cold-weather limits in addition to the other limits specified in Special Condition C.1.a.) for each batch of coating, including calculations;
  - c) If the permittee chooses to comply with the cold-weather limits, the dates and times during which the ambient temperature at the affected source was below 4.5°C (40°F) at the time the coating was applied and the volume used of each batch in the group, as supplied, during these dates;
  - d) Identification of each group of coatings and their designated thinners;
  - e) The volume used of each batch of coating in the group, as supplied;

- f) The total allowable volume of thinner for the group, including calculations; and
    - g) The actual volume of thinner used for the group.
  - 4) Demonstration of compliance through an alternative (i.e., non-Method 24 in appendix A to 40 CFR part 60) test method. The records maintained by facilities demonstrating compliance using the procedure described in Special Condition D.1.f. shall contain the following information:
    - a) Identification of the Department of Health-approved VOHAP test method or certification procedure;
    - b) For coatings to which the affected source does not add thinning solvents, the source shall record the certification of the as-supplied and as-applied VOHAP content of each batch and the volume of each coating applied;
    - c) For coatings to which the affected source adds thinning solvent on a coating-by-coating basis, the source shall record all of the information required to be recorded by Special Condition D.1.i.2) of this section; and
    - d) For coatings to which the affected source adds thinning solvent on a group basis, the source shall record all of the information required to be recorded by Special Condition D.1.i.3) of this section.
- j. If the permittee detects a violation of the standards specified in Special Condition C.1., the permittee shall, for the remainder of the reporting period during which the violation(s) occurred, include the following information in the records:
  - 1) A summary of the number and duration of deviations during the reporting period, classified by reason, including known causes for which a Federally-approved or promulgated exemption from an emission limitation or standard may apply.
  - 2) Identification of the data availability achieved during the reporting period, including a summary of the number and total duration of incidents that the monitoring protocol failed to perform in accordance with the design of the protocol or produced data that did not meet minimum data accuracy and precision requirements, classified by reason.
  - 3) Identification of the compliance status as of the last day of the reporting period and whether compliance was continuous or intermittent during the reporting period.

- 4) If, pursuant to Special Condition D.1.j.3), the permittee identifies any deviation as resulting from a known cause for which no Federally-approved or promulgated exemption from an emission limitation or standard applies, the monitoring report shall also include all records that the source is required to maintain that pertain to the periods during which such deviation occurred and the following information:
  - a) The magnitude of each deviation;
  - b) The reason for each deviation;
  - c) A description of the corrective action taken for each deviation, including action taken to minimize each deviation and action taken to prevent recurrence; and
  - d) All quality assurance activities performed on any element of the monitoring protocol.

(Auth.: HAR ' 11-60.1-3, ' 11-60.1-90; 40 CFR ' 63.785, ' 63.788)<sup>1</sup>

#### **Section E. Notification and Reporting Requirements**

1. Notification and reporting pertaining to the following events shall be done in accordance with Attachment 1, Standard Condition Nos. 17 and 25, respectively:
  - a. *Emissions of air pollutants in violation of HAR, Chapter 11-60.1 or this permit (excluding technology-based emission exceedances due to emergencies); and*
  - b. *Permanent discontinuance of construction, modification, relocation, or operation of the facility covered by this permit.*

(Auth.: HAR ' 11-60.1-8, ' 11-60.1-15, ' 11-60.1-90)

2. The permittee shall report **within five (5) working days** any deviations from the permit requirements, including those attributable to upset conditions, the probable cause of such deviations and any corrective actions or preventive measures taken. Corrective actions may include a requirement for stack testing, monitoring, or the implementation of a corrective action plan.

(Auth.: HAR ' 11-60.1-3, ' 11-60.1-15, ' 11-60.1-16, ' 11-60.1-90)

3. Compliance Certification

During the permit term, the permittee shall submit at least **annually** to the Department of Health and USEPA Region 9, a compliance certification pursuant to HAR, Subsection 11-60.1-86. The permittee shall indicate whether or not compliance is being met with each term or condition of this permit. The compliance certification shall include at a minimum the following information:

- a. The identification of each term or condition of the permit that is the basis of the certification;
- b. The compliance status;
- c. Whether compliance was continuous or intermittent;
- d. The methods used for determining the compliance status of the source currently and over the reporting period;
- e. Any additional information indicating the source's compliance status with any applicable enhanced monitoring and compliance certification including the requirements of Section 114 (a) (3) of the Clean Air Act or any applicable monitoring and analysis provisions of Section 504(b) of the Clean Air Act; and
- f. Any additional information as required by the Department of Health including information to determine compliance.

The compliance certification shall be submitted **within ninety (90) days after** the end of each calendar year, and shall be signed and dated by an authorized representative.

Upon written request of the permittee, the deadline for submitting the compliance certification may be extended, if the Department of Health determines that reasonable justification exists for the extension.

(Auth.: HAR ' 11-60.1-4, ' 11-60.1-86, ' 11-60.1-90)

4. Annual Emissions

As required by Attachment IV and in conjunction with the requirements of Attachment III, Annual Fee Requirements, the permittee shall report **annually** the total tons/yr. emitted of each regulated air pollutant, including hazardous air pollutants. The reporting of annual emissions is due **within sixty (60) days following** *the end of each calendar year*.

Upon the written request of the permittee, the deadline for reporting of annual emissions may be extended, if the Department of Health determines that reasonable justification exists for the extension.

(Auth.: HAR ' 11-60.1-3, ' 11-60.1-5, ' 11-60.1-90)

5. Shipbuilding and Ship Repair

- a. The permittee shall submit **semiannually** a written report to the Department of Health **within sixty (60) days after the end of each semi-annual calendar period (January 1 to June 30 and July 1 to December 31)**. The report shall include all of the information that must be retained pursuant to Special Conditions D.1.h. through j., except for that information specified in Special Conditions D.1.h.1), 2), and 5), D.1.i.1)a), D.1.i.2)a), D.1.i.3)a). If a violation was detected, the permittee shall also report the information specified in Special Condition D.1.j. for the reporting period during which the violation(s) occurred. To the extent possible, the report shall be organized according to the compliance procedure(s) followed each month by the affected source.
- b. The permittee shall prepare a written implementation plan that addresses the following:
  - 1) Coating compliance procedures. The implementation plan shall include the compliance procedure(s) under Special Condition D.1.c. through f. that the source intends to use.
  - 2) Recordkeeping procedures. The implementation plan shall include the procedures for maintaining the records required under Special Condition D.1., including the procedures for gathering the necessary data and making the necessary calculations.
  - 3) Transfer, handling, and storage procedures. The implementation plan shall include the procedures for ensuring compliance with Special Condition C.1.b..

(Auth.: HAR ' 11-60.1-3, ' 11-60.1-90; 40 CFR ' 63.788)<sup>1</sup>

**Section F. Testing Requirements**

1. For the compliance procedures described in Special Condition D.1.c. through e., Method 24 of 40 CFR part 60, appendix A, is the definitive method for determining the VOC content of coatings, as supplied or as applied. When a coating or thinner contains exempt compounds that are volatile HAP or VOHAP, the owner or operator shall ensure, when determining the VOC content of a coating, that the mass of these exempt compounds is included.

(Auth.: HAR ' 11-60.1-3, ' 11-60.1-90; 40 CFR ' 63.786)<sup>1</sup>

2. For the compliance procedure described in Special Condition D.1.f., the Department of Health must approve the test method for determining the VOHAP content of coatings and thinners. As part of the approval, the test method must meet the specified accuracy limits indicated below for sensitivity, duplicates, repeatability, and reproducibility coefficient of variation each determined at the 95 percent confidence limit. Each percentage value below is the corresponding coefficient of variation multiplied by 2.8 as in the ASTM Method E180-93: Standard Practice for Determining the Precision of ASTM Methods for Analysis and Testing of Industrial Chemicals.
  - a. Sensitivity. The overall sensitivity must be sufficient to identify and calculate at least one mass percent of the compounds of interest based on the original sample. The sensitivity is defined as ten times the noise level as specified in ASTM Method D3257-93: Standard Test Methods for Aromatics in Mineral Spirits by Gas Chromatography. In determining the sensitivity, the level of sample dilution must be factored in.
  - b. Repeatability. First, at the 0.1-5 percent analyte range the results would be suspect if duplicates vary by more than 6 percent relative and/or day to day variation of mean duplicates by the same analyst exceeds 10 percent relative. Second, at greater than 5 percent analyte range the results would be suspect if duplicates vary by more than 5 percent relative and/or day to day variation of duplicates by the same analyst exceeds 5 percent relative.
  - c. Reproducibility. First, at the 0.1-5 percent analyte range the results would be suspect if lab to lab variation exceeds 60 percent relative. Second, at greater than 5 percent range the results would be suspect if lab to lab variation exceeds 20 percent relative.
  - d. Any test method should include information on the apparatus, reagents and materials, analytical procedure, procedure for identification and confirmation of the volatile species in the mixture being analyzed, precision and bias, and other details to be reported. The reporting should also include information on quality assurance (QA) auditing.
  - e. Multiple and different analytical techniques must be used for positive identification if the components in a mixture under analysis are not known. In such cases a single column gas chromatograph (GC) may not be adequate. A combination of equipment may be needed such as a GC/mass spectrometer or GC/infrared system. (If a GC method is used, the operator must use practices in ASTM Method E260-91: Standard Practice for Gas Chromatography.

(Auth.: HAR ' 11-60.1-3, ' 11-60.1-90; 40 CFR ' 63.786)<sup>1</sup>



3. The coating manufacturer or permittee may use batch formulation data as a test method in lieu of Method 24 of Appendix A to 40 CFR part 60 to certify the as-supplied VOC content of a coating if the coating manufacturer or permittee has determined that batch formulation data have a consistent and quantitatively known relationship to Method 24 results. This determination shall consider the role of cure volatiles, which may cause emissions to exceed an amount based solely upon coating formulation data. Notwithstanding such determination, in the event of conflicting results, Method 24 of Appendix A of 40 CFR part 60 shall take precedence.

(Auth.: HAR ' 11-60.1-3, ' 11-60.1-90; 40 CFR ' 63.786)<sup>1</sup>

4. The permittee shall use or ensure that the coatings/thinners manufacturer uses the form and procedures mentioned in Appendix A of 40 CFR 63, Subpart II to determine values for the thinner and coating parameters used in Equations 1 and 2 of Special Condition D.1.d. The permittee shall ensure that the coating/thinner manufacturer (or supplier) provides information on the VOC and VOHAP contents of the coatings/thinners and the procedure(s) used to determine these values.

(Auth.: HAR ' 11-60.1-3, ' 11-60.1-90; 40 CFR ' 63.786)<sup>1</sup>

#### **Section G. Agency Notification**

Any document (including reports) required to be submitted by this permit shall be done in accordance with Attachment I, Standard Condition 29.

(Auth.: HAR ' 11-60.1-4, ' 11-60.1-90)

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<sup>1</sup> The citations to the Code of Federal Regulations (CFR) identified under a particular condition, indicate that the permit condition complies with the specified provision(s) of the CFR. Due to the integration of the preconstruction and operating permit requirements, permit conditions may incorporate more stringent requirements than those set forth in the CFR.

<sup>2</sup> The citations to the State Implementation Plan (SIP) identified under a particular condition, indicate that the permit condition complies with the specified provision(s) of the SIP.

**ATTACHMENT III: ANNUAL FEE REQUIREMENTS  
COVERED SOURCE PERMIT NO. 0105a-01-C**

**[Issuance Date]**

**[Expiration Date]**

The following requirements for the submittal of annual fees are established pursuant to Hawaii Administrative Rules (HAR), Title 11, Chapter 60.1, Air Pollution Control. Should HAR, Chapter 60.1 be revised such that the following requirements are in conflict with the provisions of HAR, Chapter 60.1, the permittee shall comply with the provisions of HAR, Chapter 60.1:

1. Annual fees shall be paid in full:
  - a. Within **sixty (60) days** after the end of each calendar year; and
  - b. Within **thirty (30) days** after the permanent discontinuance of the covered source.
2. The annual fees shall be determined and submitted in accordance with Hawaii Administrative Rules, Chapter 11-60.1, Subchapter 6.
3. The annual emissions data for which the annual fees are based shall accompany the submittal of any annual fees and submitted on forms furnished by the Department of Health.
4. The annual fees and the emission data shall be mailed to:

**Clean Air Branch  
Environmental Management Division  
Hawaii Department of Health  
P. O. Box 3378  
Honolulu, HI 96801-3378**

**ATTACHMENT IV: ANNUAL EMISSIONS REPORTING REQUIREMENTS  
COVERED SOURCE PERMIT NO. 0105a-01-C**

**[Issuance Date]**

**[Expiration Date]**

In accordance with the Hawaii Administrative Rules, Title 11, Chapter 60.1, Air Pollution Control, the permittee shall report to the Department of Health the nature and amounts of emissions.

1. As specified in Attachment II, Special Condition E.4, permittee shall report the total emissions (tons/yr.) for each regulated air pollutant, including hazardous air pollutants. The submittal shall include the method of calculating the emissions and all relevant data used in the calculations.
2. The reporting period shall be from January 1 to December 31 of each year. All reports shall be submitted to the Department of Health within **sixty (60) days** after the end of each calendar year and shall be mailed to the following address:

**Clean Air Branch  
Environmental Management Division  
Hawaii Department of Health  
P. O. Box 3378  
Honolulu, HI 96801-3378**

3. The permittee shall retain the information submitted, including all emission calculations. These records shall be in a permanent form suitable for inspection, retained for a minimum of five (5) years, and made available to the Department of Health upon request.
4. Any information submitted to the Department of Health without a request for confidentiality shall be considered public record.
5. In accordance with HAR, Section 11-60.1-14, the permittee may request confidential treatment of specific information, including information concerning secret processes or methods of manufacture, by submitting a written request to the Director and clearly identifying the specific information that is to be accorded confidential treatment.

**DRAFT**

**COMPLIANCE CERTIFICATION FORM  
COVERED SOURCE PERMIT NO. 0105a-01-C  
(PAGE 1 OF 2)**

**[Issuance Date]**

**[Expiration Date]**

In accordance with the Hawaii Administrative Rules, Title 11, Chapter 60.1, Air Pollution Control, the permittee shall report to the Department of Health the following certification at least annually, or more frequently as set by an applicable requirement:

(Make Copies for Future Use)

For Period: \_\_\_\_\_ Date: \_\_\_\_\_

Facility Name: US Navy – NAVSTA PHNC

**I certify that I have knowledge of the facts herein set forth, that the same are true, accurate and complete to the best of my knowledge and belief, and that all information not identified by me as confidential in nature shall be treated by Department of Health as public record. I further state that I will assume responsibility for the construction, modification, or operation of the source in accordance with the Hawaii Administrative Rules, Title 11, Chapter 60.1, Air Pollution Control, and any permit issued thereof.**

Responsible Official (Print): \_\_\_\_\_

TITLE: \_\_\_\_\_

Responsible Official (Signature): \_\_\_\_\_

Complete the following information for **each** term or condition of the permit that applies to **each** emissions unit at the source. Also include any additional information as required by the director. The compliance certification may reference information contained in a previous compliance certification submittal to the director, provided such referenced information is certified as being current and still applicable.

1. Current permit number: \_\_\_\_\_
2. Emissions Unit No./Description: \_\_\_\_\_
3. Identify the permit term(s) or condition(s) that is/are the basis of this certification:

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4. Compliance status during the reporting period:

- a. Has the emissions unit been in compliance with the identified permit term(s) or condition(s)?

☐ YES

☐ NO

- b. If YES, was compliance continuous or intermittent?

☐ Continuous

☐ Intermittent

**COMPLIANCE CERTIFICATION FORM  
COVERED SOURCE PERMIT NO. 0105a-01-C  
(CONTINUED, PAGE 2 OF 2)**

c. If NO, explain.

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5. The methods used for determining the compliance status of the emissions unit currently and over the reporting period (e.g., monitoring, recordkeeping, reporting, test methods, etc.):

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Provide a detailed description of the methods used to determine compliance: (e.g., monitoring device type and location, test method description, or parameter being recorded, frequency of recordkeeping, etc.):

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6. Statement of Compliance with Enhanced Monitoring and Compliance Certification Requirements.

a. Is the emissions unit identified in this application in compliance with applicable enhanced monitoring and compliance certification requirements?

☐ YES      ☐ NO

b. If YES, identify those requirements:

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c. If NO, describe below which requirements are not being met:

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